

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

RICHARD HANSON)	
Plaintiff,)	NO. 3:18-cv-00524
)	
v.)	
)	JUDGE TRAUGER
JOHN MCBRIDE and JAM)	JURY DEMAND
PRODUCTIONS d/b/a BLACKBIRD)	
STUDIOS)	
Defendant)	

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

Comes Plaintiff Rich Hanson and moves this Honorable Court pursuant to Rule 56 of the Federal Rules of Civil Procedure to enter summary judgment in his favor. Plaintiff contends that there are no genuine issues of material fact as to proving Defendant’s liability on Plaintiff’s claims arising under the TPPA and FLSA for retaliation. For the reasons articulated in the included Memorandum, Plaintiff is entitled to judgment as a matter of law.

In support of its Motion for Summary Judgment, Plaintiff submits the attached Memorandum of Law, Statement of Undisputed Material Facts, Notice of Filing and exhibits. For the reasons set forth in the accompanying Memorandum of Law and authorities offered in support thereof, Plaintiff respectfully requests that this Honorable Court grant summary judgment in his favor on liability under the TPPA and FLSA.

/s/ Brian C. Winfrey
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing Motion for Summary judgment was filed via this Court's CM/ECF filing system to the Attorney for Defendant of Neal & Harwell, Kendra Samson and Bill Ramsey, this the 6th day of September 2019.

/s Brian C. Winfrey
Brian C. Winfrey